

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS SALINAS-ESCAMILLA,

Defendant.

Criminal Action No. 06-

141

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

On or about December 4, 2006, in New Castle County, in the State and District of Delaware, Defendant Jesus Salinas-Escamilla, a citizen and national of Mexico, knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, did transport, move, and attempt to transfer and move such aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (a)(1)(B)(i).

NOTICE OF FORFEITURE

Upon conviction of the offense alleged in Count I of this Indictment, Defendant Jesus Salinas-Escamilla, shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(6), and 8 U.S.C. § 1324(b) & 28 U.S.C. § 2461(c), all conveyances used in the commission of the violation; all property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offense; and all property, real or personal, that was

used to facilitate, or was intended to be used to facilitate the commission of the offense, including but not limited to the following:

- \$1195 in United States currency;
- A 1996 GMC C-1500 Sierra Series truck.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

All pursuant to 18 U.S.C. § 982(a)(6) & (b), 21 U.S.C. § 853(p), 8 U.S.C. § 1324, 28 U.S.C. § 2461(c), and Fed. R. Crim. P. 32.2.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
UNITED STATES ATTORNEY

By: 
Robert F. Kravetz
Assistant U.S. Attorney

Dated: December 14, 2006